

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JASON MORANO, individually and on behalf  
of all other similarly situated,

Case No.: 2:25-cv-00883-JHC

Plaintiff,

**STIPULATED MOTION AND ORDER  
AMENDING DISCOVERY AND  
RESPONSIVE PLEADING DEADLINES**

REDFIN CORPORATION, ROCKET COMPANIES, INC., DAVID H. LISSY, GLENN KELMAN, ROBERT BASS, JULIE BORNSTEIN, KERRY D. CHANDER, AUSTIN LIGON, BRAD SINGER, JAMES SLAVET, and SELINA TOBACCOWALA,

Defendant.

## I. STIPULATED MOTION

Pursuant to LCR 7(d)(1) and LCR 10(g), Plaintiff and Defendants hereby stipulate and jointly request that the Court enter an order continuing the deadlines set forth in the Court's Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement, and further request that the Court remove Defendants' responsive pleading deadline from the calendar. In support of this motion, the parties stipulate as follows:

1. WHEREAS, on May 9, 2025, Plaintiff Jason Morano (“Plaintiff”) filed the Class Action Complaint (“Complaint”) (Dkt. 1), alleging a claim under Section 14(a) of the Securities Exchange Act of 1934 (“Exchange Act”) against Defendants Redfin Corporation (“Redfin”), Rocket Companies, Inc. (“Rocket”), and David H. Lissy, Glenn Kelman, Robert Bass, Julie

1 Bornstein, Kerry D. Chander, Austin Ligon, Brad Singer, James Slavet, and Selina Tobaccowala  
2 (collectively, the “Individual Defendants,” and collectively with Redfin and Rocket, the  
3 “Defendants”), a claim under Section 20(a) of the Exchange Act against the Individual Defendants,  
4 and a Delaware state law breach of fiduciary duty claim against the Individual Defendants;

5       2. WHEREAS, Defendants’ deadline to respond to the Complaint is currently set for  
6 August 4, 2025;

7       3. WHEREAS, on May 16, 2025, Plaintiff filed a Motion for Preliminary Injunction  
8 (Dkt. 23), requesting that the Court enjoin (i) the stockholder vote scheduled for June 4, 2025, and  
9 (ii) the consummation of the Merger itself (Dkt. 23-1), which, after subsequent filings by the  
10 parties, was resolved by the Court on June 3, 2025 (Dkt. 53);

11       4. WHEREAS, on June 11, 2025, Plaintiff filed a Motion for an Award of Reasonable  
12 Attorneys’ Fees and Expenses (Dkt. 55, the “Fee Petition”), which Defendants opposed on  
13 June 26, 2025 (Dkt. 59), and with respect to which Plaintiff filed a reply (Dkt. 60);

14       5. WHEREAS, the Fee Petition remains pending;

15       6. WHEREAS, on July 7, 2025, the Court issued its Order Regarding Initial  
16 Disclosures, Joint Status Report, and Early Settlement (Dkt. 62, the “Scheduling Order”), setting  
17 a July 21, 2025 deadline for the parties’ FRCP 26(f) Conference, an August 4, 2025 deadline for  
18 the parties’ initial disclosures pursuant to FRCP 26(a)(1), and an August 11, 2025 deadline for the  
19 parties to submit a combined joint status report and discovery plan pursuant to FRCP 26(f) and  
20 LCR 26(f);

21       7. WHEREAS, the parties have discussed the outstanding Fee Petition and Scheduling  
22 Order, and have agreed that (i) the claims set forth in Plaintiff’s Complaint are now moot;  
23 (ii) Defendants do not need to file a responsive pleading to the Complaint to resolve this matter;  
24 and (iii) the only remaining issue in the case is the resolution of the Fee Petition; and

25       8. WHEREAS, in the interest of efficiently and expediently resolving this matter, the  
26 parties further agree that all other deadlines set by the Court may be held in abeyance pending the

1 Court's resolution of the Fee Petition without prejudice to any party.

2 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED among the  
 3 undersigned Parties, and respectfully submitted for the Court's approval, that:

4 1. (i) The FRCP 26(f) Conference deadline set for July 21, 2025, (ii) the Initial  
 5 Disclosures Pursuant to FRCP 26(a)(1) deadline set for August 4, 2025, (iii) Defendants'  
 6 Responsive Pleading deadline set for August 4, 2025, and (iv) the Combined Joint Status Report  
 7 and Discovery Plan as Required by FRCP 26(f) and LCR 26(f) deadline set for August 11, 2025  
 8 are all continued indefinitely and held in abeyance pending the Court's resolution of the Fee  
 9 Petition; and

10 2. To the extent convenient for the Court, the parties will prepare a form of judgment  
 11 in this matter within fourteen (14) days of the Court's decision on the Fee Petition.

12  
 13 Dated: July 10, 2025

Respectfully submitted,

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 15 By: /s/ Roger M. Townsend  
 Roger M. Townsend

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 24 STIPULATION & ORDER  
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 26 By: /s/ Jonathan Tamimi  
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*Attorneys for Defendant*  
 ROCKET COMPANIES, INC.

## II. ORDER

The Court, having considered the stipulated motion and being fully informed,

IT IS HEREBY ORDERED THAT:

1. (i) The FRCP 26(f) Conference deadline set for July 21, 2025, (ii) the Initial Disclosures Pursuant to FRCP 26(a)(1) deadline set for August 4, 2025, (iii) Defendants' Responsive Pleading deadline set for August 4, 2025, and (iv) the Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and LCR 26(f) deadline set for August 11, 2025 are all continued indefinitely and held in abeyance pending the Court's resolution of the Fee Petition; and

2. The parties will prepare a form of judgment in this matter within fourteen (14) days of the Court's decision on the Fee Petition.

DATED this 10th day of July, 2025.

John H. Chun  
 John H. Chun  
 United States District Judge